

Procedure to activate air sample collection:

The Trace Atmospheric Gas Analyzer (TAGA) is being used to screen specific areas for target contaminants that are affiliated with the aftermath of Hurricane Harvey.

If the TAGA monitoring values exceed the Texas Commission on Environmental Quality (TCEQ) Air Monitoring Comparison Values (AMCV) Short Term benchmarks, and all readings exceed the AMCV benchmarks over a 5 minute monitoring interval, then an **Area Specific Evaluation** is warranted. If there are multiple exceedances identified by the TAGA over the 5 minute monitoring interval, but are not continuous exceedances, then the TAGA will attempt to isolate the source of the exceedances. Hand held monitors can also be employed to further isolate the area of contaminant exceedances. If exceedances are intermittent, this information will be noted and monitoring will continue. If the exceedances are continuous, then an **Area Specific Evaluation** may be warranted. Refer to division supervisor in coordination with EU to determine AREA specific evaluation.

Area Specific Evaluation:

If the TAGA monitoring identifies an elevated contaminant, as defined by exceeding the established benchmarks, further evaluation of the suspected source is warranted. Around the detected contamination, personnel will be deployed to the facility to conduct assessment with PID and FLIR cameras.

Pollutants to be detected at the low ppb detection limit:

benzene
ethylbenzene
m/p-xylene
methyl tert-butyl ether
o-xylene
toluene
vinyl chloride
Carbon monoxide
Sulfur dioxide
Hydrogen sulfide
NOx
VOCs
1,3 Butadiene

Plan: Monitor Force Majeure refineries in the Houston and Beaumont areas:

Day	Date	City	Facilities	Miles
Thursday	9/14/2017	Deer Park	Shell Deer Park Refinery	7.2
		Deer Park	Shell Deer Park Chemical Plant	
		Deer Park	Vopak Deer Park	

Friday	9/15/2017	Sweeny	Phillips 66	70
		Point Comfort	Formosa Plastics	70
		Victoria	Invista Victoria	31
Saturday	9/16/2017	Houston	Back to Houston	132
		Baytown	Exxon Mobil Baytown Refinery	26
		Baytown	Exxon Mobil Baytown Chemical Plant	
		Baytown	Exxon Mobil Baytown Olefins Plant	
Sunday	9/17/2017	Texas City	Marathon Texas City	31
		Texas City	Blanchard Refinery	
		Texas City	Valero Texas City	
Monday	9/18/2017	Port Arthur	Flint Hills Port Arthur	100
		Port Arthur	Motiva	
		Port Arthur	Total	
		Port Arthur	Valero Premcor	
		Port Neches	Shell Pipeline - Crude Product (RN103017521)	
Tuesday	9/19/2017	Beaumont	ExxonMobil Beaumont Polyethylene	22
		Beaumont	ExxonMobil Beaumont Colonial Storage	
		Beaumont	ExxonMobil Beaumont Refinery	
		Beaumont	ExxonMobil Beaumont Chemical Plant	
		Beaumont	Nearby Tank Farms?	
Wednesday	9/20/2017	Beaumont	Invista Orange	30
			Back to Houston	85